



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

July 22, 2013

Ms. Kelly Jean Heffner  
Deputy Secretary for Water Management  
Pennsylvania Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, Pennsylvania 17105

Dear Ms. Heffner:

The U.S. Environmental Protection Agency (EPA) is pleased to approve the sediment and phosphorus Total Maximum Daily Loads (TMDLs) for the Mahoning Creek watershed. The TMDLs were established to address impairments of water quality, caused by siltation, organic enrichment and low dissolved oxygen, as identified on Pennsylvania's 2008 Section 303(d) List. The Pennsylvania Department of Environmental Protection submitted the report, *Mahoning Creek Watershed TMDL, Columbia and Montour Counties*, to EPA for review and approval on June 18, 2013. The TMDLs were established and submitted in accordance with Sections 303(d)(1)(c) and 303(d)(2) of the Clean Water Act. A rationale of our approval is enclosed.

In accordance with Federal regulations at 40 CFR § 130.7, a TMDL must comply with the following requirements: (1) be designed to attain and maintain the applicable water quality standards; (2) include a total allowable loading and, as appropriate, wasteload allocations for point sources and load allocations for nonpoint sources; (3) consider the impacts of background pollutant contributions; (4) take critical stream conditions into account (the conditions when water quality is most likely to be violated); (5) consider seasonal variations; (6) include a margin of safety (which accounts for uncertainties in the relationship between pollutant loads and instream water quality); and (7) be subject to public participation. The sediment and phosphorus TMDLs for the Mahoning Creek watershed satisfy each of these requirements. In addition, the TMDLs consider reasonable assurance that the TMDL allocations assigned to nonpoint sources can be reasonably met.

As you know, all new or revised National Pollutant Discharge Elimination System permits must be consistent with the TMDL wasteload allocations pursuant to 40 CFR § 122.44 (d)(1)(vii)(B). Please submit all such permits to EPA for review as per EPA's letter dated September 29, 1998.

If you have any questions please call me, or contact Ms. Jennifer Sincock, Pennsylvania TMDL Coordinator, at 215-814-5766.

Sincerely,

/S/

Jon M. Capacasa, Director  
Water Protection Division

Enclosure

cc: Bill Brown, PADEP



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**Decision Rationale**  
**Total Maximum Daily Loads of**  
**Sediment and Phosphorus**  
**Mahoning Creek Watershed**  
**Columbia and Montour Counties, Pennsylvania**

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**Jon M. Capacasa, Director**  
**Water Protection Division**

**Date: July 22, 2013**

**Decision Rationale**  
**Total Maximum Daily Loads of Sediment and Phosphorus**  
**Mahoning Creek Watershed**  
**Columbia and Montour Counties, Pennsylvania**

## **I. Introduction**

The Clean Water Act (CWA) requires a Total Maximum Daily Load (TMDL) be developed for those waterbodies identified as impaired by a state where technology based and other controls will not provide for the attainment of water quality standards. A TMDL is a determination of the amount of a pollutant from point, nonpoint, and natural background sources, including a Margin of Safety (MOS) that can be discharged to a water quality-limited waterbody.

This document sets forth the U.S. Environmental Protection Agency's (EPA) rationale for approving the TMDLs for sediment and phosphorus in the Mahoning Creek watershed. The TMDLs were established to address impairments of water quality, caused by siltation, organic enrichment and low dissolved oxygen, as identified on Pennsylvania's 2008 Section 303(d) List for water quality-limited segments. The Pennsylvania Department of Environmental Protection (PADEP) submitted the report, *Mahoning Creek Watershed TMDL, Columbia and Montour Counties*, to EPA for final review and approval on June 18, 2013. The TMDL report addresses fifteen impaired stream segments in the Mahoning Creek watershed.

EPA's rationale is based on the determination that the TMDLs meet the following seven regulatory conditions pursuant to 40 CFR Part 130.

1. The TMDLs are designed to implement applicable water quality standards.
2. The TMDLs include a total allowable load as well as individual wasteload allocations (WLAs) and load allocations (LAs).
3. The TMDLs consider the impact of background pollutant contributions.
4. The TMDLs consider critical environmental conditions.
5. The TMDLs consider seasonal environmental variations.
6. The TMDLs include an MOS.
7. The TMDLs have been subject to public participation.

In addition, the TMDLs consider reasonable assurance that the TMDL allocations assigned to nonpoint sources can be reasonably met.

## **II. Summary**

Table 1 presents the Pennsylvania 2008 Section 303(d) listing information for the Mahoning Creek Watershed<sup>1</sup>.

**Table 1. Pennsylvania's 2008 Section 303(d) List of the Impaired Stream**

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<sup>1</sup> 2008 *Pennsylvania Integrated Water Quality Monitoring and Assessment Report*. Pennsylvania Department of Environmental Protection: Harrisburg, Pennsylvania.

### Segments in the Mahoning Creek Watershed

| Segment ID | Year Listed | Stream Name               | HUC      | Source                                  | Cause                        | Miles |
|------------|-------------|---------------------------|----------|---|------------------------------|-------|
| 4774       | 2004        | Mahoning Creek            | 02050107 | Agriculture, Urban Runoff/ Storm Sewers | Siltation                    | 0.56  |
| 4807       | 2004        | Mahoning Creek            | 02050107 | Agriculture                             | Siltation                    | 1.74  |
| 3881       | 2004        | Mausies Creek             | 02050107 | Agriculture                             | Siltation                    | 3.15  |
| 4759       | 2004        | Mausies Creek             | 02050107 | Agriculture                             | Siltation                    | 1.63  |
| 4774       | 2004        | Mausies Creek             | 02050107 | Agriculture, Urban Runoff/ Storm Sewers | Siltation                    | 1.19  |
| 3873       | 2004        | Mausies Creek (UNT 27347) | 02050107 | Agriculture                             | Organic Enrichment/ Low D.O. | 1.07  |
| 4724       | 2004        | Kase Run                  | 02050107 | Agriculture                             | Siltation                    | 0.54  |
| 4754       | 2004        | Kase Run                  | 02050107 | Agriculture                             | Siltation                    | 2.71  |
| 4820       | 2004        | Kase Run (UNT 27365)      | 02050107 | Agriculture                             | Siltation                    | 1.21  |
| 4754       | 2004        | Kase Run (UNT 27366)      | 02050107 | Agriculture                             | Siltation                    | 1.29  |
| 4754       | 2004        | Kase Run (UNT 27370)      | 02050107 | Agriculture                             | Siltation                    | 0.29  |
| 4724       | 2004        | Kase Run (UNT 27373)      | 02050107 | Agriculture                             | Siltation                    | 0.54  |
| 4754       | 2004        | Kase Run (UNT 27373)      | 02050107 | Agriculture                             | Siltation                    | 0.14  |
| 4944       | 2004        | Sechler Run               | 02050107 | Agriculture                             | Siltation                    | 2.62  |
| 4945       | 2004        | Sechler Run (UNT 27405)   | 02050107 | Agriculture                             | Siltation                    | 1.52  |

Pennsylvania's 2008 Section 303(d) List has identified 19.13 miles within the Mahoning Creek watershed as impaired by siltation (sediment) and 1.07 miles as impaired by organic enrichment/low dissolved oxygen (phosphorus). Attachment A of the TMDL Report, *Mahoning Creek Watershed Impaired Waters*, presents a map of the impaired stream segments that will need to be addressed through the development of a TMDL in the watershed.

### III. Background

The Mahoning Creek watershed is approximately 39.6 square miles in area and is located within Columbia and Montour Counties, Pennsylvania. The watershed is a part of the State Water Plan (SWP) 5E in the Hydrologic Unit Code 02050107 (Upper Susquehanna – Lackawanna). The headwaters of Mahoning Creek originate in the eastern portion of Columbia County and flow south to its confluence with the Susquehanna River. The major tributaries to Mahoning Creek include Kase Run, Mausies Creek, Sechler Run, and several unnamed tributaries. The dominant land use in the Mahoning Creek watershed is forest, which constitutes approximately 50 percent of the land use area. Other land use types in the watershed include agriculture (38%) and developed land uses (12%). The highest elevations are located in the eastern portion of the watershed.

The Mahoning Creek watershed was first identified as impaired in 2004 based on data collected through the Statewide Surface Waters Assessment Protocol (SSWAP). The SSWAP is

a modification of EPA's 1989 Rapid Bioassessment Protocol II and provides for a more consistent approach for assessing impairments in Pennsylvania's rivers and streams than previously used methods. Through the use of the SSWAP in the Mahoning Creek watershed, an impairment was documented based on biological surveys, habitat surveys, and water quality sampling. The cause of the impairment was determined to be from siltation, organic enrichment, and low dissolved oxygen levels emanating from agricultural land use practices, as indicated in Table 1.

TMDLs were developed for sediment and phosphorus in order to address the water quality impairments identified by the state. A phosphorus TMDL was determined to be an appropriate surrogate for the organic enrichment/low dissolved oxygen impairment since high concentrations of phosphorus have been linked to increases of aquatic biomass within the watershed. Tables 2 and 3 present the sediment and phosphorus TMDLs developed for the Mahoning Creek watershed, on a daily load basis. In order to meet the TMDL endpoints established for the watershed, sediment loadings will need to be limited to a total of 22,751.41 pounds per day (lbs/day) and phosphorus loadings will need to be limited to a total of 22.84 lbs/day.

**Table 2. Mahoning Creek Watershed Sediment TMDL  
(lbs/day)**

| <b>TMDL</b> | <b>WLA</b> | <b>LA</b> | <b>MOS</b> |
|-------------|------------|-----------|------------|
| 22,751.41   | 283.33     | 20,192.94 | 2,275.14   |

**Table 3. Mahoning Creek Watershed Phosphorus TMDL  
(lbs/day)**

| <b>TMDL</b> | <b>WLA</b> | <b>LA</b> | <b>MOS</b> |
|-------------|------------|-----------|------------|
| 22.84       | 1.72       | 18.84     | 2.28       |

### *Computational Procedures*

The ArcView Generalized Watershed Loading Function (AVGWLF)<sup>2</sup> model was used to establish the existing loading conditions for the Mahoning Creek watershed. The AVGWLF model provides the ability to simulate runoff, sediment, and nutrient (N and P) loadings from a watershed given variable-size source areas (e.g., agricultural, forested, and developed land). When establishing the existing conditions for a watershed, seasonal variations in hydrology, climatic conditions, and watershed activities are explicitly accounted for. The primary source of data for the AVGWLF model is geographical information system (GIS) formatted databases and shapefiles. This information is used in the model to automatically derive the required values for model parameters. Table 4 presents the existing loading conditions produced for sediment and phosphorus in the Mahoning Creek watershed.

**Table 4. Existing Loading Conditions in the  
Mahoning Creek Watershed**

| <b>Pollutant</b> | <b>Existing Loading Conditions<br/>(lbs/day)</b> |
|------------------|--|
|------------------|--|

<sup>2</sup> ArcView Generalized Watershed Loading Function model, the Environmental Resources Research Institute of Pennsylvania State University's ArcView based version of the GWLF model developed by Cornell University.

|            |           |
|------------|-----------|
| Sediment   | 48,768.34 |
| Phosphorus | 26.36     |

A reference watershed approach was used to establish the load reductions required for the Mahoning Creek watershed. A reference watershed approach is based on selecting a non-impaired watershed that shares similar land use, ecoregion, and geomorphological characteristics with the impaired watershed. The stream conditions and loadings in the reference watershed are assumed to be the conditions needed for the impaired watershed to attain standards. Therefore, the TMDL intends to replicate the loadings of the reference watershed in the impaired watershed to allow it to attain water quality standards. The equation used to obtain the TMDL values through the reference watershed approach in the Mahoning Creek watershed is expressed below:

$$\begin{array}{ccccc} \textit{Area of Impaired} & & \textit{Unit Area Loading Rate of the} & & \textit{TMDL value for the Impaired} \\ \textit{Watershed} & x & \textit{Reference Watershed} & = & \textit{Watershed} \\ \textit{(ac)} & & \textit{(lb/ac/day)} & & \textit{(lb/day)} \end{array}$$

#### IV. Discussion of Regulatory Conditions

EPA finds that Pennsylvania has provided sufficient information to meet all seven of the basic requirements for establishing TMDLs for sediment and phosphorus in the Mahoning Creek watershed. Additionally, Pennsylvania provided reasonable assurance that the TMDLs can be met. EPA is, therefore, approving the TMDLs. EPA's approval is outlined according to the regulatory requirements listed below.

##### *1) The TMDL is designed to meet the applicable water quality standards.*

Water quality standards are state regulations that define the water quality goals of a waterbody. Water quality standards are comprised of three components: (1) designated uses, (2) criteria necessary to protect those uses, and (3) antidegradation provisions that prevent the degradation of water quality. There are no "high quality," or Tier II, stream segments in the impaired portion of the Mahoning Creek watershed that require the implementation of Pennsylvania's antidegradation policy. The designated use of the Mahoning Creek watershed is Warm Water Fishes and Migratory Fishes, as referenced in Pennsylvania Title 25 §93.9.

Pennsylvania does not currently have specific numeric criteria for sediment and phosphorus. Therefore, to establish endpoints such that the designated uses of the Mahoning Creek watershed are attained and maintained, Pennsylvania utilizes its narrative water quality criteria, which states that:

*Water may not contain substances attributable to point or nonpoint source discharges in concentration or amounts sufficient to be inimical or harmful to the water uses to be protected or to human, animal, plant or aquatic life.*

To establish TMDL endpoints for sediment and phosphorus that are protective of the Mahoning Creek watershed's designated uses; a reference watershed approach was used. The objective of a reference watershed approach is to reduce the loading rate of a pollutant in an impaired stream segment to a level equivalent to the loading rate in a non-impaired reference stream segment. This load reduction will result in conditions favorable to the return of a healthy

biological community in the impaired stream segment.

The selection of a reference watershed for an impaired watershed must follow specific guidelines to ensure that a suitable match is identified. In general, three factors are considered when selecting a suitable reference watershed: (1) attainment of water quality standards using the Statewide Surface Waters Assessment Protocol; (2) close resemblance to the impaired watershed in physical properties such as land cover/land use, physiographic province, and geology; and (3) similarity in size (within 20-30% of the impaired watershed area). Both the impaired watershed and the reference watershed should be matched to the best extent possible; however, most variations can be adjusted in the AVGWLF model, if necessary.

Roaring Creek subwatershed was selected as the reference watershed for the Mahoning Creek watershed after field surveys and evaluations of background data verified that it was best suited for the reference watershed approach. The suitability of the reference watershed was further confirmed through discussions with both PADEP staff and stakeholders familiar with the watershed. The Roaring Creek subwatershed is located in SWP subbasin 5E and is a tributary of the Susquehanna River. The reference watershed is designated as a Cold Water Fishes and Trout Stocked Fishes and is currently attaining its designated uses. Table 5 presents the land use comparison between the Mahoning Creek watershed and the Roaring Creek subwatershed.

**Table 5. Land use Comparison between the Mahoning Creek Watershed and the Reference Watershed**

| <b>Pollutant Source</b>    | <b>Mahoning Creek Watershed (acres)</b> | <b>Roaring Creek Subwatershed (acres)</b> |
|----------------------------|---|---|
| Hay/Pasture                | 5,379.5                                 | 3,971.0                                   |
| Cropland                   | 3,874.6                                 | 3,790.6                                   |
| Forest                     | 11,957.4                                | 11,584.3                                  |
| Wetland                    | 7.4                                     | 32.1                                      |
| Turf Grass                 | 192.7                                   | 0.0                                       |
| Unpaved Road               | 22.2                                    | 24.7                                      |
| Transition                 | 93.9                                    | 51.9                                      |
| Low Intensity Development  | 3,674.5                                 | 773.4                                     |
| High Intensity Development | 173.0                                   | 0.0                                       |
| Total                      | 25,375.2                                | 20,228.0                                  |

EPA finds that the TMDLs will attain and maintain the applicable water quality standards through the reference watershed approach. Refer to Tables 2 and 3 for a summary of the allowable loads for the Mahoning Creek watershed.

**2) *The TMDL includes a total allowable load as well as individual wasteload allocations and load allocations.***

Total Allowable Loads



EPA regulations at 40 CFR §130.2(i) state that *the total allowable load shall be the sum of individual WLAs for point sources, LAs for nonpoint sources, and natural background concentrations*. The sediment and phosphorus TMDLs developed for the Mahoning Creek watershed is consistent with 40 CFR §130.2(i) because the total loads provided by PADEP equal the sum of the individual WLAs for the point sources and the land based LAs for nonpoint sources.

#### Wasteload Allocations

The WLA portion of the TMDL is the total loading of a pollutant that is assigned to point sources. In the Mahoning Creek watershed, there are two point sources that discharge sediment into the watershed: Valley Township Municipal Authority (PA0029068) and Mooresburg Wastewater Treatment Plant (PA0209261). Sediment and phosphorus WLAs were developed for the point sources, based on the facilities design flow and their permitted pollutant concentrations. A bulk reserve was included in the WLAs to account for the dynamic nature of permit activity in the watershed. The bulk reserve was calculated as one percent of the TMDL value. Tables 6 and 7 present the sediment and phosphorus WLAs developed for the Mahoning Creek watershed.

**Table 6. Sediment WLAs developed for the Mahoning Creek Watershed**

| Name                                  | NPDES Permit # | Permit Limit (mg/L) | Design Flow (mgd) | Sediment WLA (lbs/yr) | Sediment WLA (lbs/day) |
|---------------------------------------|----------------|---------------------|-------------------|-----------------------|------------------------|
| Valley Township Municipal Authority   | PA0029068      | 30.0                | 0.21              | 19,189.88             | 52.57                  |
| Mooresburg Wastewater Treatment Plant | PA0209261      | 30.0                | 0.013             | 1,188.075             | 3.25                   |
| Bulk Reserve                          |                |                     |                   | 83,042.63             | 227.51                 |
| Total                                 |                |                     |                   | 103,420.6             | 283.33                 |

**Table 7. Phosphorus WLAs developed for the Mahoning Creek Watershed**

| Name                                  | NPDES Permit # | Permit Limit (mg/L) | Design Flow (mgd) | Phosphorus WLA (lbs/yr) | Phosphorus WLA (lbs/day) |
|---------------------------------------|----------------|---------------------|-------------------|-------------------------|--------------------------|
| Valley Township Municipal Authority   | PA0029068      | 0.8                 | 0.21              | 511.73                  | 1.402                    |
| Mooresburg Wastewater Treatment Plant | PA0209261      | 0.8                 | 0.013             | 31.68                   | 0.0868                   |
| Bulk Reserve                          |                |                     |                   | 83.36                   | 0.228                    |
| Total                                 |                |                     |                   | 626.77                  | 1.7168                   |

### Load Allocations

The LA is the actual portion of the TMDL that is assigned to nonpoint sources. In the Mahoning Creek watershed, the LA was computed by subtracting the WLA and the MOS from the TMDL value. The calculation used to obtain the LA value for sediment and phosphorus in the Mahoning Creek watershed is expressed below:

$$\text{Sediment LA (lbs/day)} = 22,751.41 \text{ (TMDL)} - 283.33 \text{ (WLA)} - 2,275.14 \text{ (MOS)} = 20,192.94$$

$$\text{Phosphorus LA (lbs/day)} = 22.84 \text{ (TMDL)} - 1.72 \text{ (WLA)} - 2.28 \text{ (MOS)} = 18.84$$

The Equal Marginal Percent Reduction (EMPR) allocation method was used to distribute the LA to the nonpoint sources of sediment and phosphorus in the watershed. The EMPR procedures were performed using Microsoft Excel and are described in Attachment F of the TMDL Report. Table 8 presents the LAs developed for the nonpoint sources of sediment and phosphorus in the Mahoning Creek watershed.

**Table 8. Load Allocations for the Mahoning Creek Watershed**

| <b>Pollutant Source</b> | <b>Pollutant Loading (lbs/day)</b> | <b>Pollutant Loading (lbs/day)</b> |
|-------------------------|------------------------------------|------------------------------------|
|                         | <b>Sediment</b>                    | <b>Phosphorus</b>                  |
| Cropland                | 8,831.22                           | 9.49                               |
| Hay/Pasture             | 717.67                             | 2.47                               |
| Developed               | 875.59                             | 0.80                               |
| Stream Banks            | 8,831.22                           | 0.40                               |
| Forest                  | 936.99                             | 0.70                               |
| Wetlands                | 0.05                               | 0.00                               |
| Groundwater             | NA                                 | 4.90                               |
| Septic Systems          | NA                                 | 0.08                               |

#### ***3) The TMDLs consider the impacts of background pollution.***

The sediment and phosphorus TMDLs for the Mahoning Creek watershed consider the impact of background pollutants by considering loadings from background sources like forests, and calibrating the AVGWLF model to observed conditions.

#### ***4) The TMDLs consider critical environmental conditions.***

According to EPA's regulation 40 CFR §130.7(c)(1), TMDLs are required to take into account critical conditions for stream flow, loading, and water quality parameters. The intent of this requirement is to ensure that the water quality of an impaired watershed will be protected during the times when it is most vulnerable.

The AVGWLF model, which was used to develop the sediment and phosphorus TMDLs

for the Mahoning Creek watershed, is a continuous simulation model that uses daily time steps for weather data and water balance calculations. The model, therefore, incorporated the variable inputs needed to represent critical conditions during low flows – generally associated with point source loads, and critical conditions during high flows – generally associated with nonpoint source loads.

**5) *The TMDLs consider seasonal environmental variations.***

Seasonal variations involve changes in stream flow and loadings as a result of hydrologic and climatological patterns. In the continental United States, seasonally high flows normally occur in early spring from snow melt and spring rain, while seasonally low flows typically occur during the warmer summer and early fall drought periods.

The AVGWLF model considered seasonal variation in the Mahoning Creek watershed through a number of mechanisms: Daily time steps were used for weather data and water balance calculations. In addition, the model also allowed for monthly-variable parameter inputs such as, hours of daylight in each month, the growing season, and the months of the year when manure is applied to the land. The combination of these actions by the model accounts for seasonal variability.

**6) *The TMDLs include a Margin of Safety.***

This requirement is intended to add a level of safety to the modeling process. The MOS may be implicit, built into the modeling process by using conservative modeling assumptions; or explicit, taken as a percentage of the WLA, LA, or TMDL.

An explicit MOS of ten percent was used for the Mahoning Creek watershed sediment and phosphorus TMDLs. The MOS was taken as a percentage of the TMDLs to account for any uncertainties in the methodology used to determine the loadings.

**7) *The TMDL has been subject to public participation.***

A notice of availability for comments on the Mahoning Creek watershed sediment and phosphorus TMDLs was published in the *Pennsylvania Bulletin* on April 30, 2011, and *The Press Enterprise* and *Standard Journal* newspaper on April 27, 2011, to foster public comment on the allowable loads calculated. A public meeting was held on May 4, 2011, at the Mahoning Township Building, to discuss the proposed TMDLs. The public participation process (which ended on May 30, 2011) was provided for the submittal of comments. Pennsylvania did not receive any written comments during the public participation period for the TMDLs.

**V. Discussion of Reasonable Assurance**

Once the sediment and phosphorus TMDLs for the Mahoning Creek watershed have been approved by EPA, measures must be taken to reduce pollution levels from both point and nonpoint sources. For the WLA component of the TMDL, WLAs will be implemented through the NPDES permit process. According to 40 CFR §122.44(d)(1)(vii)(B), the effluent limitations for an NPDES permit must be consistent with the assumptions and requirements of any available WLA for the discharge prepared by the State and approved by EPA. Furthermore, EPA has

authority to object to the issuance of an NPDES permit that is inconsistent with WLAs established for that point source.

For the LA component of the TMDL, PADEP intends on reducing the nonpoint sources of sediment and phosphorus through the use of Best Management Practices (BMPs) in the watershed. The BMPs that would be helpful in lowering the amount of sediment and phosphorus in the Mahoning Creek watershed include the following: stream bank stabilization and fencing, riparian buffer strips, strip cropping, conservation tillage, stormwater retention wetlands, and heavy use area protection, among many others. These BMPs will likely be performed by the Columbia and Montour County Conservation Districts and citizen groups.

The National Resources Conservation maintains a *National Handbook of Conservation Practices*, which provides information on a variety of BMPs. Many of the practices described in the handbook could be used in the Mahoning Creek watershed to help limit sediment and phosphorus loadings. Determining the most appropriate BMPs, where they should be installed, and actually putting them into practice will require the development and implementation of restoration plans. Development of any restoration plan will involve the gathering of site-specific information regarding current land uses and existing conservation practices. This type of assessment has been ongoing in the Mahoning Creek watershed, and is strongly encouraged to continue.

EPA recognizes that reasonable assurance is also provided through Pennsylvania's Watershed Implementation Plans (WIPs) designed to meet target loads consistent with the Chesapeake Bay TMDL. The Chesapeake Bay TMDL, established by EPA in 2010, requires reductions of nitrogen, phosphorus and sediment loads throughout the Bay watershed to meet water quality standards that protect the designated uses in the Bay and its tidal tributaries. Pennsylvania's Phase I and Phase II WIPs together with the State's schedule of two-year milestones provide implementation strategies and a time line for achieving nitrogen, phosphorus, and sediment reductions across the State to meet Chesapeake Bay interim target loads by 2017, equivalent to 60% of the final target goals set for 2025 to fully implement the Chesapeake Bay TMDL in Pennsylvania. A Phase III Plan will be developed in 2017 to address the additional reductions needed from 2018 through 2025 to meet the final targets.

The nitrogen, phosphorus and sediment reductions for the Bay TMDL are independent of those needed to implement any TMDLs developed to address nitrogen, phosphorus and sediment-related impairments in Pennsylvania's non-tidal waterbodies (including Mahoning Creek watershed), although their reduction goals and strategies do overlap. For example, the implementation planning framework, developed by the Bay watershed jurisdictions in partnership with EPA, provides a staged approach to achieving Bay TMDL reduction goals that are also applicable to implementation of nitrogen, phosphorus and sediment TMDLs in local non-tidal watersheds. In short, nitrogen, phosphorus and sediment reductions required to meet the Chesapeake Bay TMDL will also support the restoration and protection of local water quality.

The following websites provide further information regarding Pennsylvania's efforts to implement the Chesapeake Bay TMDL.

PADEP Chesapeake Bay Program website:

[http://www.portal.state.pa.us/portal/server.pt/community/chesapeake\\_bay\\_program/10513](http://www.portal.state.pa.us/portal/server.pt/community/chesapeake_bay_program/10513)

Pennsylvania's Phase I WIP:

<http://files.dep.state.pa.us/Water/Chesapeake%20Bay%20Program/ChesapeakePortalFiles/WIPs/REVISED%20FINAL%20Chesapeake%20Bay%20WIP%20-%20sent%20to%20EPA%2012-23-10.pdf>

Pennsylvania's Phase II WIP:

[http://files.dep.state.pa.us/Water/Chesapeake%20Bay%20Program/ChesapeakePortalFiles/4-2-2012/Clean%20FINAL%20Phase%202%20WIP%203-30-2012%20\(2\).pdf](http://files.dep.state.pa.us/Water/Chesapeake%20Bay%20Program/ChesapeakePortalFiles/4-2-2012/Clean%20FINAL%20Phase%202%20WIP%203-30-2012%20(2).pdf)

Pennsylvania's Phase II WIP Wastewater Supplement:

[http://files.dep.state.pa.us/Water/Wastewater%20Management/EDMRPortalFiles/Phase\\_2\\_WIP\\_Supplement.pdf](http://files.dep.state.pa.us/Water/Wastewater%20Management/EDMRPortalFiles/Phase_2_WIP_Supplement.pdf)

Pennsylvania's Milestones for 2011-2013:

<http://files.dep.state.pa.us/Water/Chesapeake%20Bay%20Program/ChesapeakePortalFiles/7-9-2012/PA%20FINAL%202012-2013%20Milestones.pdf>